

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

PRINCE MEMORIAL BAPTIST CHURCH

Plaintiff

v.

WESTERN WORLD INSURANCE COMPANY

Defendant

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Civil Action No. _____

DEFENDANT'S NOTICE OF REMOVAL

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Defendant Western World Insurance Company files this Notice of Removal.

1. Plaintiff Prince Memorial Baptist Church is now and when suit was filed a religious entity formed under the laws of the state of Texas with its principal place of business in Texas. (Removal Index 001, ¶ 2.)

2. Defendant Western World Insurance Company is now a corporation incorporated in the State of New Hampshire with its principal place of business in New Jersey, and when suit was filed a corporation incorporated in the State of New Hampshire with its principal place of business in New Jersey. (Removal Index 013.)

3. Because Plaintiff is now and was a citizen of Texas when suit was filed and because Defendant Western World is now and when suit was filed a citizen of New Hampshire and New Jersey, complete diversity of citizenship exists among the parties.

4. This Notice of Removal is timely because it is filed within 30 days of the Oct. 9, 2024 filing date of the removed action, Cause No. 141-358516-24 in the 141st District Court, Tarrant County Texas. (Removal Index 001.)

5. The amount in controversy exceeds \$75,000, exclusive of interest and costs, as the

Plaintiff seeks more than \$200,000.00 in alleged damages. (Removal Index 001, ¶ 1.)

6. Because complete diversity of citizenship exists among the parties and because the amount in controversy exceeds \$75,000.00 exclusive of interest and costs, this action is removable under 28 U.S.C. §§ 1332(b) and 1441.

7. Removal venue is proper in the present Court pursuant to 28 U.S.C. 1441(a), because the United States District Court for the Northern District of Texas, Fort Worth Division, embraces the 141st District Court, Tarrant County Texas, where the state court action, Cause No. 141-358516-24, was originally filed. (Removal Index 001.)

8. True and correct copies of the state court materials and the state court's docket sheet are filed with this Notice. (Removal Index 001 - 012.)

CONCLUSION

By this Notice of Removal, Defendant does not waive any objections as to service, jurisdiction or venue or any other defenses or objections in this action, except as expressly herein admitted, and Defendants expressly reserve all defenses, motions and pleas.

Respectfully submitted,

ROBERT G. HOGUE, P.C.

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COUNSEL FOR DEFENDANT WESTERN WORLD
INSURANCE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of October, 2024, a true and correct copy of this document was served on counsel of record for the Plaintiff as follows:

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Via ECF

ATTORNEYS FOR PLAINTIFF PRINCE
MEMORIAL BAPTIST CHURCH

By: s/Robert G. Hogue